

UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF FLORIDA
FORT LAUDERDALE DIVISION

Case Number: 25-cv-60803-WPD

K.MIZRA LLC,

Plaintiff,

v.

CITRIX SYSTEMS, INC. and CLOUD
SOFTWARE GROUP, INC.,

Defendants.

JOINT MOTION TO REPLACE CLERK'S APPOINTED MEDIATOR

Plaintiff K.Mizra LLC ("Plaintiff") and Defendants Citrix Systems, Inc., and Cloud Software Group, Inc. (collectively, "Defendants" and, together with Plaintiff, the "Parties"), respectfully request that this Court authorize the Parties to mediate before the Honorable Peter Weinstein, Florida Circuit Court Judge (Ret.), of the mediation firm Salmon & Dulberg, 1395 Brickell Avenue, Suite 800, Miami, Florida 33131, Telephone (305) 371-5490, Email: peter@sd-adr.com. The Parties jointly state as follows in support of this Motion:

Pursuant to this Court's Scheduling Order, the Parties met and conferred regarding the selection of a mediator. (ECF No. 46 ¶ 6(b).) The Parties failed to reach an agreement as to the mediator, so on December 1, 2025, Plaintiff filed a Request for Clerk to Appoint Mediator. (ECF No. 50.) On December 2, 2025, the Clerk of the Court appointed Elaine E. Feldman, of the mediator firm Salmon & Dulberg, 9301 SW 62nd Court, Miami, Florida 33156, Telephone: (305) 773-7312, Email: elainefeldmanesq@gmail.com, to serve as the mediator in this Action. (ECF No. 51.) The Parties subsequently agreed to mediate this Action before Ms. Feldman on Wednesday,

January 21, 2026.

On Friday, January 16, 2026, after Defendants submitted their confidential mediation statement, Ms. Feldman contacted the Parties' counsel to inform them that she "do[es] not have sufficient experience in patent cases and do[es] not believe [she] is the best fit for this dispute." (Feldman Email, ECF No. 62-1 (attached hereto as **Exhibit 1**)). Ms. Feldman further stated that she would inquire among her colleagues at Salmon & Dulberg whether anyone had sufficient patent litigation experience to serve as a replacement mediator for this Action. (*Id.*)

That same day, Ms. Feldman's office confirmed that Judge Weinstein is "knowledgeable on these types of matters" and is available to mediate this Action on the Parties' previously selected date, January 21, starting at 1:30 p.m. (*Id.*) On Saturday, January 17, 2026, the Parties confirmed that they mutually agree to have Judge Weinstein serve as the mediator in this Action.

Accordingly, the Parties respectfully request that this Court enter an order replacing Ms. Feldman with Judge Weinstein as the Parties' mediator in this Action.

Dated: January 20, 2026

Respectfully submitted,

By: /s/ Gerald E. Greenberg

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